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February 27, 2018

To the Honorable Jerrold N. Poslusny Jr.
401 Market Street
P.O. Box 2067,
Camden, NJ 08101-2067

Debtor(s): Arthur L. Handson III
Bankruptcy Case #: 17-24179 JNP
Mortgaged Premises: 249 Mystic Dr, Egg Harbor Township,, NJ 08234
Secured Creditor: CIT Bank, N.A., fka OneWest Bank, N.A., fka OneWest Bank,
FSB

Dear Judge Poslusny:

Please accept this letter brief in lieu of a more formal objection on behalf of CIT Bank, N.A., fka OneWest Bank, N.A., fka OneWest Bank, FSB (respondent), in response to the Debtor's Motion to Expunge Proof of Claim. Respondent holds a mortgage lien on real property located at 249 Mystic Dr., Egg Harbor Township,, NJ 08234.

Debtor seeks to expunge the proof of claim of Secured Creditor because Debtor no longer resides in the property and intends to negotiate a deed-in-lieu of foreclosure. However, unless and until a deed is executed, accepted, and recorded, Secured Creditor continues to have a claim and continues to have a lien against the subject property. Debtor's proposed order expunges the claim and reduces it to zero. Neither of those actions are supported by the facts or law in this case. The total amount due, and the arrears, are still claims against the Debtor up until the time that the property is sold at sheriff sale, the total debt is paid in full, or Secured Creditor accepts title or less than the full amount due to satisfy its lien, either by way of short sale or deed-in-lieu of foreclosure.

Accordingly, because the lien remains on the property and the claim is still valid as to the subject property, this motion should be denied. If the order is amended to reflect that the claim is not to be paid or otherwise addressed in this bankruptcy case, and that Secured Creditor's lien remains in full force and effect, this objection will be withdrawn.

Respectfully,

KML Law Group, PC

/s/ Denise Carlon

Denise Carlon

Attorney for Respondent

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